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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SHIN-EI BOEKI, LTD.,
Plaintiff

v.

SCOTT KAJIYA, MICHAEL W.
BINGHAM, CARY BRIGGS, SIGN
LANGUAGE EYEWEAR, INC, DBA
SIGN LANGUAGE HABITAT, and SI
SCOOTER WORKS, LLC.,
Defendants

CIVIL ACTION NO. 1:CV-00-2241

(Judge Kane)

FILED
HARRISBURG, PA

JUN 19 2002

MARY E. D'ANDREA, CLERK
Per
Deputy Clerk

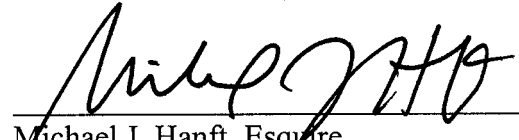
MOTION FOR ENLARGEMENT OF TIME

Defendant Scott Kajiya hereby moves and respectfully request that this Honorable Court grant a Motion for Enlargement of Time within which to file a response to the Amended Complaint filed in the above-captioned matter. Defendant Scott Kajiya respectfully request that he be given until the end of business June 20, 2001 within which to file said response. Defendant Scott Kajiya

has relocated his business office, changed business telephone numbers and was not in communication with his counsel because Defendant Kajiya was under the mistaken beliefs that (i) Defendant Brigg's filing of a Petition for Bankruptcy stayed the entire case, not just the case against Defendant Briggs, and (ii) that Sign Language Eyewear, Inc.'s ceasing to do business ended the above-referenced matter. The Answer to the Amended Complaint, filed simultaneously with this Motion, is attached hereto as Exhibit "A".

Respectfully submitted,

HANFT & KNIGHT, P.C.



Michael J. Hanft, Esquire

Attorney ID No. 57976

19 Brookwood Avenue, Suite 106

Carlisle, PA 17013

(717) 249-5373

Attorneys for Defendant Scott Kajiya

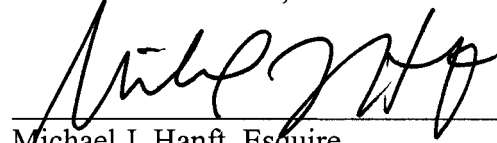
Dated: June 19, 2002

CERTIFICATE OF SERVICE

AND NOW, this 19th day of June, 2002, I, Michael J. Hanft, Esquire, hereby certify that I have this day served the following persons with a copy of the foregoing document, by first class, United States Mail, postage pre-paid, addressed as follows:

Jonathan S. Ziss, Esquire
SILVERMAN BERNHEIM & VOGEL
Two Penn Center Plaza, Suite 910
Philadelphia, PA 19102
Attorneys for Plaintiff

HANFT & KNIGHT, P.C.

A handwritten signature in black ink, appearing to read 'Michael J. Hanft', is written over a horizontal line.

Michael J. Hanft, Esquire
Attorney ID No. 57976
19 Brookwood Avenue, Suite 106
Carlisle, PA 17013-9142
(717) 249-5373

Attorneys for Defendant Scott Kajiya

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SHIN-EI BOEKI, LTD.,	:	
Plaintiff	:	
	:	CIVIL ACTION
v.	:	
	:	No. 1: CV - 00- 2241
SCOTT KAJIYA, MICHAEL W.	:	
BINGHAM, CARY BRIGGS,	:	(Judge Kane)
SIGN LANGUAGE EYEWEAR, INC.	:	
d/b/a HABITAT,	:	
and SI SCOOTER WORKS, INC.,	:	
Defendants	:	

DEFENDANT SCOTT KAJIYA'S ANSWER TO THE AMENDED COMPLAINT

AND NOW, this 19th day of June, 2002 comes Defendant Scott Kajiya, by and through its undersigned attorney, Michael J. Hanft, Esquire of Hanft and Knight, P.C., hereby files the following Answer to the Amended Complaint and, in support thereof, avers as follows:

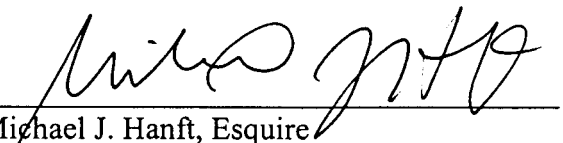
1. Denied as stated.
2. Admitted.
3. Admitted in part, denied in part. Mr. Kajiya's address is 1872 Del Amo Blvd., Unit B, Torrance, CA 90501.

4. Admitted.
5. Admitted.
6. Admitted in part, denied in part. Sign Language Eyewear, Inc. has ceased doing business.
7. Admitted.
8. Admitted.
9. Admitted.
10. Denied. It is specifically denied that Defendant Kajiya executed Exhibit "A" to the Amended Complaint.
11. Denied.
12. Denied.
13. Denied.
14. Denied.
15. Denied.
16. The answers to Paragraphs 1 through 15 above are incorporated by reference as if fully set forth herein.
17. Denied.
18. Denied.
19. Admitted in part, denied in part. It is admitted Exhibit "B" was sent. It is denied that Defendant Kajiya owes or owed any monies to Plaintiff.
20. Denied.
21. Denied.

WHEREFORE, Defendant Scott Kajiya requests this Honorable Court find in favor of Defendant Scott Kajiya and against Plaintiff with regard to Plaintiff's Amended Complaint.

Respectfully Submitted,

HANFT & KNIGHT, P.C.



Michael J. Hanft, Esquire
Attorney I.D. No. 57976
19 Brookwood Avenue, Suite 106
Carlisle, Pennsylvania 17013-9142
(717) 249-5373

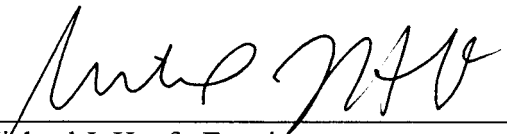
Attorneys for Defendant Scott Kajiya

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Jonathan S. Ziss, Esquire
SILVERMAN, BERNHEIM & VOGEL
Two Penn Center Plaza, Suite 910
Philadelphia, Pennsylvania 19102
Attorney for Plaintiff, Shin-Ei Boeki, Ltd.

HANFT & KNIGHT, P.C.



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Attorneys for Defendant Scott Kajiya